

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

**In re:  
WADE MARTIN ROME  
KATHLEEN MALONEY ROME**

**Case No: 6:15-bk-02498-KSJ**

**Chapter 7**

**Debtors.**

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**CARLA P. MUSSELMAN, CHAPTER 7.  
TRUSTEE FOR THE ESTATE OF,  
WADE MARTIN ROME AND  
KATHLEEN MALONEY ROME,**

**Plaintiff,**

**v.**

**Adversary Proceeding  
No. 6:15-ap-00130-KSJ**

**WADE MARTIN ROME and  
KATHLEEN MALONEY ROME,**

**Defendants.**

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**JOHN BELTRAMO, AS TRUSTEE OF THE JOHN W.  
BELTRAMO REVOCABLE TRUST DATED,  
FEBRUARY 27, 1992, (hereinafter "BELTRAMO"),**

**Plaintiff,**

**v.**

**Adversary Proceeding  
No. 6:15-ap-00131-KSJ**

**WADE MARTIN ROME and  
KATHLEEN MALONEY ROME,**

**Defendants.**

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**ROBERT THOMAS, individually and as assignee,  
beneficiary or successor to ROBERT THOMAS III,**

**TRUSTEE OF THE ROBERT THOMAS REVOCABLE  
TRUST DATED APRIL 6, 1989, FREDERICK  
LAUFER, individually and as assignee, beneficiary,  
or successor to FREDERICK LAUFER, M.D. and LAURA  
WALSH AS TENANTS BY THE ENTIRETIES,  
and BRIAN KAUFMAN, individually and as assignee,  
beneficiary or successor to RICHARD F. KAUFMAN  
and NORMA V. KAUFMAN TRUSTEES OF KAUFMAN  
REVOCABLE LIVING TRUST DATED JANUARY 30, 1996**

**Plaintiffs,**

**v.**

**Adversary Proceeding  
No. 6:15-ap-00132-KSJ**

**WADE MARTIN ROME,**

**Defendant.**

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**MOTION FOR JUDICIAL NOTICE**

COME NOW the Defendants, by and through Counsel undersigned, and move pursuant to Rule 201, Federal Rules of Evidence (“Rules”), for the Court to judicially notice the provisions of the Adversary Proceedings described below, and in support thereof states as follows:

1. Rule 201(b)(2) provides that the Court may judicially notice a fact that is not subject to reasonable dispute because it can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.

2. The Court “must take judicial notice if a party requests it and the court is supplied with the necessary information.” Fed. R. Evid. 201(c)(2).

3. “The court may take judicial notice at any stage of the proceeding.” Fed. R. Evid. 201(d).

4. The Debtor requests that the Court judicially notice:

a. *Musselman, Trustee, v. Appelman*, Case No.: 6:17-ap-00038-KSJ

b. *Musselman, Trustee, v. Lambert*, Case No.: 6:17-ap-00039-KSJ

c. *Musselman, Trustee, v. Rome, et al.*, Case No.: 6:17-ap-00040-KSJ

WHEREFORE the Debtor prays the Court judicially notice the adversary proceedings described above, and for such other further relief that the Court deems just and proper.

Respectfully submitted this 14<sup>th</sup> day of June, 2017.

/s/ Jeffrey S. Ainsworth  
Jeffrey S. Ainsworth, Esquire  
Florida Bar No.: 060769

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished on this 14<sup>th</sup> day of June, 2017, by electronic transmission and/or prepaid first class US mail to: Bradley M. Saxton, Esquire, Winderwee Haines Ward & Woodman, P.A., P.O. Box 1391, Orlando, Florida 32802; Scott E. Bomkamp, Esquire, United States Trustee, 400 W. Washington Street, Suite 1100, Orlando, FL 32801; Cheryl Thompson, Esquire, Thompson Law Practice, P.A., 301 W. Platt Street, Suite 656, Tampa, Florida 33606.

/s/ Jeffrey S. Ainsworth  
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